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5 **UNITED STATES DISTRICT COURT**

6 **DISTRICT OF NEVADA**

7 ISABEL IBARRA,

8 Plaintiff,

9 vs.

10 CENTURY SECURITY MANAGEMENT OF
11 LAS VEGAS CORP., a Nevada Domestic
Corporation; DOES 1 through 10; and ROE
12 BUSINESS ENTITIES 1 through 10,
inclusive,

13 Defendants.

14 CASE NO. 2:18-cv-01706-MMD-VCF

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR THE
FILING OF DISPOSITIVE MOTIONS
AND APPROVE DEPOSITIONS
OUTSIDE OF DISCOVERY PERIOD**

FIRST REQUEST

15 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
16 record, hereby stipulate and request that this Court extend the deadline to file dispositive motions in
17 the above-captioned case sixty (60) days, up to and including **Monday, June 15, 2020** (June 13
18 being a Saturday) The current deadline is April 14, 2020.

19 This Request for an extension of time is not sought for any improper purpose or other
20 purpose of delay. This request for extension is based upon the following:

21 The depositions of three final witnesses were noticed by the Plaintiff for Friday, March 13,
22 2020. However, these witnesses developed scheduling conflicts, including one key witness, Donald
23 Marty Stein who is both a percipient witness and designated as a Rule 30(b)(6) witness for the
24 Defendant on several topics, being prohibited from traveling from Florida to Las Vegas for his
25 deposition due to travel restrictions during the current coronavirus pandemic crisis. Mr. Stein will
26 not be able to attend his deposition in Las Vegas until the first week of June 2020. The parties have
27 agreed to take the depositions of the three final witnesses after the current discovery cutoff of March
28 16, 2020 in order to accommodate the witness' schedules. These three depositions are scheduled as

1 | follows:

1. Elizabeth Ungaro April 6, 2020;
 2. Larry Anderson April 17, 2020;
 3. Donald Marty Stein June 5, 2020.

5 Defendant reserves the right to seek additional depositions should the testimony and evidence
6 provided by these witnesses warrant them. The extension will allow the parties enough time to
7 obtain the necessary transcripts prior to preparing their dispositive motions.

8 WHEREFORE, the parties respectfully request that this Court approve the above and extend
9 the time for the parties to file their dispositive motions by sixty (60) days from the current deadline
10 of April 14, 2020 up to and including June 15, 2020.

11 Dated this 13th day of March, 2020
12 KEMP & KEMP
13 By: /s/ James P. Kemp
14 JAMES P. KEMP, ESQ.
7435 W. Azure Drive, Suite 110
15 Las Vegas, Nevada 89130
16 -and-
17 KEVIN A. SPRENZ, ESQ.
SPRENZ LAW
18 9960 W. Cheyenne Avenue #170
19 Las Vegas, NV 89129
20 Attorneys for Plaintiff, Isabel Ibarra
Dated this 13th day of March, 2020
LIPSON NEILSON P.C.
By: /s/ Lisa J. Zastrow
JOSEPH P. GARIN, ESQ. (NV Bar No. 6653)
LISA J. ZASTROW, ESQ. (NV Bar No. 9727)
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Las Vegas, Nevada 89144
*Attorneys for Defendant
Century Security Management of Las Vegas
Corp.*

21 If defendant wishes to take more depositions, it must seek leave of court.

ORDER

25 | IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

March 23, 2020